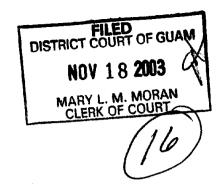
# - ORIGINAL •

#### CARLSMITH BALL LLP

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Attorneys for Plaintiff Hansen Helicopters, Inc.



## IN THE DISTRICT COURT OF GUAM

HANSEN HELICOPTERS, INC.,

Plaintiff,

VS.

OCEAN AIR LOGISTICS, LORENZO LOPEZ and AMERICAN NATIONAL FIRE INSURANCE COMPANY,

Defendants.

CIVIL CASE NO. CIV02-00029

PLAINTIFF HANSEN HELICOPTERS, INC.'S RULE 26(A)3 PRETRIAL DISCLOSURES; DECLARATION OF SERVICE

## I. WITNESSES

- A. Witnesses Hansen Helicopters, Inc. expects to call at Trial.
  - 1. Jon Walker, owner of Hansen Helicopters.
  - 2. A representative from AON Insurance, most likely Mr. George Baldwin.
- **B.** Witnesses Hansen Helicopters, Inc. may call if the need arises.
  - 1. Timothy Westman of Allied Marine Surveyors.
  - 2. Any witness called by the defense.

#### II. DOCUMENTS AND EXHIBITS

C. Documents and exhibits Hansen Helicopters, Inc. expects to offer at Trial.

4816-0618-8032.1.051998-00038

1. OceanAir's invoice to Hansen Helicopters showing the \$3,125.00 premium

OceanAir charged and collected from Hansen for insurance on the helicopter.

2. OceanAir's application to its insurance broker for a single shipment cargo

insurance policy for the helicopter.

3. The Certificate of Insurance issued to OceanAir for a single shipment cargo

insurance policy for the helicopter.

4. The insurance policy.

5. Hansen Helicopters' Notice of Damage to aircraft and claim.

6. The insurance company's denial of Hansen's claim

7. Hansen Helicopters' statement of damage to the helicopter and repair costs.

8. Allied Marine Surveyors' Survey Report

**D.** Documents and exhibits Hansen Helicopters, Inc. may offer if the need arises.

1. Ocean bill of lading for the helicopter.

2. Hansen Helicopters' Notice of Loss or Damage.

**E.** Other witnesses and documents.

Hansen Helicopters, Inc. reserves the right to supplement this disclosure of witnesses and documents, to call rebuttal witnesses as required and to offer written rebuttal and

impeachment evidence as required.

DATED: Hagåtña, Guam, November 18, 2003.

CARLSMITH BALL LLP

DAVID LEDGER

ELYZE McDONALD

Attorneys for Plaintiff

Hansen Helicopters, Inc.

Case 1:02-cv-00029

# **DECLARATION OF SERVICE**

I, David Ledger, hereby declare under penalty of perjury of the laws of the United States, that on the 18th day of November 2003, I will cause to be served, via hand delivery, a true and correct copy of Plaintiff Hansen Helicopter, Inc.'s Rule 26(a)3 Pretrial Disclosures; Declaration of Service, upon Defendant Ocean Air Logistics and Lorenzo Lopez's Counsel of record as follows:

Steven A. Zamsky, Esq. Zamsky Law Firm Suite 805, GCIC Building 414 West Soledad Avenue Hagåtña, Guam 96910

Executed this 18th day of November 2003 at Hagåtña, Guam.

DAVID LEDGER

Case 1:02-cv-00029